

Hess, Alana

From: Hess, Alana
Sent: Wednesday, October 31, 2018 12:17 PM
To: 'Langford, Mallory'
Cc: Wells, Jay; Henry, Tadd; Farmer, Kevin; Pinkerton, Blake
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Extension granted. I'll look for your comments and responses on November 30, 2018. Have a Happy Halloween and Thanksgiving!

Thanks,

Alana L. Hess, P.E.
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102
(573) 526-0189

We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department's Customer Satisfaction Survey at <https://www.surveymonkey.com/r/MoDNRsurvey>. Thank you.

From: Langford, Mallory <mlangford@aeci.org>
Sent: Wednesday, October 31, 2018 11:21 AM
To: Hess, Alana <Alana.Hess@dnr.mo.gov>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>; Pinkerton, Blake <BPinkerton@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Alana,

Thank you for the draft operating permit and questions, we have begun reviewing both. Due to the complexity of the operating permit, we would like to request that the due date for the comments and questions be extended to November 30, 2018.

Thank you for the consideration,

Mallory Langford
Environmental Analyst
2814 S. Golden Ave.
Springfield, MO 65807

(417) 371-5237 Office
(816) 787-7431 Cell
mlangford@aeci.org

From: Hess, Alana <Alana.Hess@dnr.mo.gov>
Sent: Tuesday, October 30, 2018 3:55 PM
To: Pinkerton, Blake <BPinkerton@aeci.org>; Langford, Mallory <mlangford@aeci.org>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

****EXTERNAL E-MAIL** Think before clicking links or attachments.**

Ms. Langford,

Thank you for submitting additional information on August 17, 2018.

Would you please provide answers to the following additional questions I have about the installation by **November 14, 2018**?

1. Now that the landfill is in operation, is FE-03 Fly Ash Unloading to the Ash Ponds still an active emission source? I.e., does FE-03 need to remain in the permit?
2. Does the installation use CyClean still? I.e., do the CyClean emission sources need to be included in the permit?
3. Questions regarding IA-04 (5) Glycol tanks and IA-18 Glycol Heater Vents:
 - a. By Glycol do you mean Ethylene Glycol (107-21-1)? If not, ethylene glycol, would you please provide a CAS # or SDS for the glycol? This doesn't really have any permitting implications, I'm just trying to get accurate information for the PTE in the Statement of Basis.
 - b. What is this glycol used for? This doesn't really have any permitting implications, I'm just trying to get accurate information for the installation/emission source description in the Statement of Basis.
 - c. Is the heater electric or does it combust fuel? If it combusts fuel:
 - i. Please indicate the type and MHDR.
 - ii. Please explain why AECI believes this heater does or does not meet the MACT DDDDD definition of process heater.
4. Could you describe IA-20 Soot Blowing Air Compressor Vents in more detail? Please explain why AECI believes this emission source does or does not emit visible emissions.
5. Please explain why AECI believes IA (2) 2.29 MMBtu/hr LPG-fired heaters and (2) 2 MMBtu/hr LPG-fired heaters do or do not meet the MACT DDDDD definition of process heater.
6. Would you please submit your phenol emission factors for EP-01 and EP-02 that were used to determine EIQ emissions? I was able to locate a phenol emission factor in AP-42 of 1.6E-5 lb/ton; however, using it results in lower potential emissions than actual reported emissions in the 2017, 2016, 2015, 2014, and 2013 EIQs. I'm guessing that you all are using some type of site specific value. This doesn't have any permitting implications, I just want to provide an accurate phenol PTE in the statement of basis.

Attached is a mainly complete draft operating permit. Please review the draft and submit any questions/comments you may have by **November 14, 2018**.

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=
[vPWzcWen7IArchLuifWm92FJIn99oUHBvjGclK5KGdkt8pZThUCh12Gb5awb3qRVI8b_WqsRfb_8INJpwYLOwmxrJrNOBPubnqcQEDcGSTVQw-FcdwLMsqW1aIJa1C4Z4qBTLEfx_dXmY9mOIT86wylj6cEKvam76fM1I0N8I62clq/https%3A%2F%2Fwww.surveymonkey.com%2Fr%2FMoDNRsurvey](https://secure-web.cisco.com/1xkfVR8PbsX-JkyGxZ6id1X3Ilyi5yMskhJlrzQR6dsAdXqwbwUWWCHQKIoioIlxXmJWZ1Y0G0ZqQTr_bjtWTPdL_Qe5jckVmlJwKpu). Thank you.

From: Hess, Alana
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To: 'Pinkerton, Blake' <BPinkerton@aeci.org>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Blake,

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4. Please submit your Phase II NOx Compliance Plan (and Phase II NOx Averaging Plan if applicable) for Boilers 1 and 2.
5. Please submit a CAIR Permit application. Although rescinded on the federal level, the CAIR program remains in our State Implementation Plan (SIP); therefore, technically we still have to have a CAIR permit in the Part 70 as CAIR is technically still an applicable requirement. We are working on removing CAIR requirements from our SIP.

Please try to provide this information by August 20, 2018.

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https://secure-web.cisco.com/1xkfVR8PbsX-JkyGxZ6id1X3Ilyi5yMskhJlrzQR6dsAdXqwbwUWWCHQKIoioIlxXmJWZ1Y0G0ZqQTr_bjtWTPdL_Qe5jckVmlJwKpu

vPWzcWen7IArchLuifWm92FJIn99oUHBvjGclK5KGdkdt8pZThUCh12Gb5awb3gRVI8b_WgsRfb_8INJpwYLOwmxrJrNOBpubnqcQEDcGSTVQw-FcdwLMsqW1aIJJa1C4Z4qBTLEfx_dXmY9mOIT86wylj6cEKvam76fM1I0N8I62clg/https%3A%2F%2Fwww.surveymonkey.com%2Fr%2FMoDNrsurvey. Thank you.

From: Pinkerton, Blake <BPinkerton@aeci.org>
Sent: Monday, April 10, 2017 4:27 PM
To: Hess, Alana <Alana.Hess@dnr.mo.gov>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Ms. Hess,

Please see the responses to your questions below regarding our New Madrid Power Plant.

Please provide answers to the following questions:

1. Are the two 2.4 MMBtu/hr fuel oil heaters in No Construction Permit Required Determination 2016-01-004 (2016-01-004.pdf) EU0290 and EU0300 Tioga Heaters or are these different heaters? **The Tioga Heaters referenced as EU0290 and EU0300 are hard piped stationary units used at the crusher house. The units referenced in the No Construction Permit Required Determination are the same type/size, but skid mounted (portable) and rented for short term use during the winter months.**
2. No Construction Permit Required Determination 2012-06-072 states that you planned to use 14 275 HP barge pumps instead of EP-09 8 300 HP barge pumps and EP-13 2 345 HP barge pumps. Did this change occur? **The change did not occur. Still have the 8 as EP-09 and 2 as EP-13.**
3. How many acres are active at any given time in the landfill? **Each cell is 25 acres. Only 1 cell will be "active" at a time. Currently using Phase L- Cell 1, will switch to Phase III – Cell 2 when full.**
4. Construction Permit 092006-004 states that Boilers 1 and 2 have an MHDR of 7,150 MMBtu/hr, EPA's Air Markets Program indicates that Boiler 1 has an MHDR of 6,728 MMBtu/hr and Boiler 2 has an MHDR of 6,985 MMBtu/hr; however, the previous operating permit and your application state the MHDRs are only 6,340 MMBtu/hr. Please explain these discrepancies. EPA generally requires us to use the MHDR in the Air Markets Program unless sufficient justification can be provided for an increase/decrease in the MHDR... **I do not have the historical data on this but the higher number may have been used to represent the higher BTU Illinois coal before the switch to PRB. We are not opposed to using the numbers listed in the Air Markets Program but what would the implications be for using those numbers if it is found that the 6,340 MMBtu/hr is a better number?**
5. Would you please send me a copy of New Madrid's MATS initial NOC? **I have attached a copy to this email.**

From: Hess, Alana [<mailto:Alana.Hess@dnr.mo.gov>]
Sent: Wednesday, March 29, 2017 3:01 PM
To: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

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Missouri Department of Natural Resources

Phone: (573) 526-0189
Fax: (573) 751-2706
E-mail: alana.hess@dnr.mo.gov

Mailing Address:
Air Pollution Control Program – Permits Section
Attn: Alana Hess
P.O. Box 176
Jefferson City, MO 65102

From: Hess, Alana
Sent: Tuesday, March 28, 2017 10:41 AM
To: 'jwells@aeci.org'; thenry@aeci.org
Subject: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

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I may have questions for you throughout my review and drafting of the permit. Please respond to all questions within 15 days. An extension is available upon request.

I look forward to working with you.

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Attachments: 2015-04-093 New Madrid Power Plant.docx

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From: EIQOnWeb@dnr.mo.gov
Sent: Tuesday, October 30, 2018 12:03 PM
To: Hess, Alana
Subject: EIQ Report 2013 NEW MADRID POWER PLANT MARSTON
143-0004.
Attachments: eiq.pdf

Your EIQ report was generated on Tue Oct 30 12:03:02 CDT 2018

Hess, Alana

From: EIQOnWeb@dnr.mo.gov
Sent: Tuesday, October 30, 2018 12:03 PM
To: Hess, Alana
Subject: EIQ Report 2014 NEW MADRID POWER PLANT MARSTON
143-0004.
Attachments: eiq.pdf

Your EIQ report was generated on Tue Oct 30 12:02:40 CDT 2018